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July 29, 2020

BY ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: SEC v. Telegram Group, Inc. & TON Issuer Inc., No. 19 Civ. 9439(PKC)

Dear Judge Castel:

Pursuant to our discussion earlier today with Your Honor's Law Clerk, we respectfully request that the Court direct the sealing of the following docket entries. We make these sealing requests in order to comply with the Court's June 17, 2020 Sealing Order (ECF No. 238) ("Order"). More specifically, the 12 documents listed require certain additional redactions that the Court approved in Appendix C of the Order. As indicated below, fully redacted copies of these documents have already been filed on the docket.

Defendants anticipate that these requests should resolve all remaining sealing issues relating to documents publicly filed by Defendants in this action.

1. **ECF No. 83-14** (Exhibit N to the McGrath Declaration, *see* Order, Appendix C, p. 25, refiled as ECF No. 219-6)
2. **ECF No. 170-11** (PX 2, *see* Order, Appendix C, p. 18-19, refiled as ECF No. 187-1)

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3. **ECF No. 170-13** (PX 4, *see* Order, Appendix C, p. 19, refiled as ECF No. 187-3)
4. **ECF No. 170-15** (PX 61, *see* Order, Appendix C, p. 21, refiled as ECF No. 187-4)
5. **ECF No. 170-16** (PX 69, *see* Order, Appendix C, p. 21, refiled as ECF No. 187-5)
6. **ECF No. 170-17** (PX 70, *see* Order, Appendix C, p. 21, refiled as ECF No. 187-6)
7. **ECF No. 170-18** (PX 74, *see* Order, Appendix C, p. 21, refiled as ECF No. 187-7)
8. **ECF No. 170-21** (PX 101, *see* Order, Appendix C, p. 22, refiled as ECF No. 187-8)
9. **ECF No. 170-22** (PX 102, *see* Order, Appendix C, p. 22, refiled as ECF No. 187-9)
10. **ECF No. 170-24** (PX 109, *see* Order, Appendix C, p. 23, refiled as ECF No. 187-10)
11. **ECF No. 170-29** (PX 147, *see* Order, Appendix C, p. 23, refiled as ECF No. 187-12)
12. **ECF No. 170-32** (PX 152, *see* Order, Appendix C, p. 24, refiled as ECF No. 187-13)

We are available if the Court has any questions regarding this request.

Respectfully submitted,

/s/Alexander C. Drylewski
Alexander C. Drylewski

cc: All Counsel of Record